

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA



**FILED**

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Order Instituting Rulemaking Regarding the  
Implementation of the Suspension of Direct Access  
Pursuant to Assembly Bill 1X and Decision 01-09-060

Rulemaking 02-01-011  
(January 9, 2002)

**NOTICE OF *EX PARTE* COMMUNICATION**

Pursuant to Rule 8.3 of the California Public Utilities Commission's ("CPUC") Rules of Practice and Procedure, and the requirement set forth in the subject order instituting rulemaking (R.02-01-011 at 5), the Power and Water Resources Pooling Authority ("PWRPA") hereby gives notice of the following *ex parte* communication.

The communication occurred on February 6, 2007, at approximately 1:30 p.m., and consisted of a meeting between Scott Blaising, counsel for PWRPA, and Rami Kahlon, advisor to CPUC President Michael Peevey, at the CPUC's offices in San Francisco. The communication was oral, although a written document was used as part of the meeting. (See attached document.)

Blaising communicated that PWRPA is opposed to Pacific Gas and Electric Company's ("PG&E") rate proposal contained within its petition to modify Decision 06-07-030. Blaising noted that the issue presented by PG&E's petition (namely, whether the Department of Water Resources ("DWR") Power Charge for departing load should be determined on a residual basis using a cap of 2.7 cents per kWh) is the same issue that PWRPA protested in response to PG&E's Advice Letter 2835-E. Blaising stated that the DWR Power Charge should not be determined as proposed by PG&E, but instead should be determined based on actual accrued costs, which is the methodology used by Southern California Edison Company ("SCE"), as reflected in Decision 07-01-030 and SCE Advice Letter 1980-E-A. As described in PWRPA's protest, PG&E's proposed methodology results in a DWR Power Charge of \$0.01347 cents per kWh, instead of a charge of \$0.00 or thereabouts (which is the estimated accrual rate reflected in D.06-07-030), significantly overcollecting CRS revenue from PWRPA's customers. Blaising urged the CPUC to reject PG&E's proposal, and instead base the DWR Power Charge on actual accrued costs.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Scott Blaising", is positioned above the typed name and contact information.

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February 8, 2007

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### Who is PWRPA?

- Certain of WAPA's preference power customers banded together and formed a joint powers agency (a publicly owned utility) to serve their electricity needs in the post-2004 time period.
- Only some of PWRPA's customers' electric accounts were previously served by WAPA; the remaining accounts were served by PG&E prior to January 1, 2005. But, on January 1, 2005 these accounts (known as Additional Customer Load) began to be served by PWRPA.
- PWRPA's Additional Customer Load is responsible for CRS. (Some CRS exceptions were given to PWRPA customers: split-wheeling, Dual Supply and New Load, but not for Additional Customer Load.)

### What is the issue?

- PG&E currently has before the ALJ in R.02-01-011 a petition to modify D.06-07-030. [***President Peevey is the new assigned commissioner.***] In that petition, PG&E seeks approval of a methodology for determining the DWR Power Charge ***during the pre-July 2006*** period. (There is no dispute about the DWR Power Charge methodology for the post June 2006 period.)
  - PG&E proposes to use a ***residual*** methodology for the pre-July 2006 period: PG&E takes 2.7 cents and deducts from this amount the DWR Bond Charge (\$0.0485), the Energy Cost Recovery Amount (\$0.0437) and the Competition Transition Charge (\$0.0431), resulting in a DWR Power Charge of 1.347 cents per kWh.
  - PWRPA strongly opposes PG&E's proposal
    - PWRPA filed a protest in response to PG&E Advice Letter 2835-E-A.
    - PWRPA supports CMUA's response to PG&E's petition to modify.

### What is wrong with PG&E's proposal?

- The residual CRS cap (2.7 cents per kWh) should not be used for final determinations of rates.
  - Although the cap was used for direct access, it was deferred for MDL and never used.
  - The cap was never intended to be the final, actual rate; rather, it was a balancing mechanism. (See D.03-07-028 – "The MDL CRS obligation level shall be subject to final determination, updating and true-up in accordance with the processes and procedures adopted for...Direct Access.")
- Since PG&E's proposal does not use "actual" accrual rates, the proposal grossly overcollects CRS from departing load.
  - As described in PWRPA's protest and CMUA's response, instead of charging \$0 or thereabouts for the DWR Power Charge (which is the estimated accrual rate in D.06-07-030), PG&E's methodology arrives at a DWR Power Charge of 1.347 cents per kWh.
    - Charging 1.347 cents per kWh instead of \$0 results in millions of dollars being overcollected, with no proposal for how this money will be refunded.

### What should the Commission do?

- The Commission should reject PG&E's proposal, and should require PG&E to charge departing load based on "actual" accrual rates.
  - Now that the finalization of CRS has occurred through D.06-07-030 and D.07-01-030, PG&E can and must be required to establish the DWR Power Charge based on actual accrual rates.
    - This is consistent with D.03-07-028 and other departing load decisions, which require a true-up and a final determination of actual CRS obligations.
    - This is consistent with what SCE has done; SCE charges departing load based on actual DWR Power Charge accrual rates. (See D.07-01-030 and SCE Advice Letter 1980-E-A.)

**CERTIFICATE OF SERVICE**

I certify that the following is true and correct:

On February 8, 2007, I served an electronic copy of the attached:

**NOTICE OF *EX PARTE* COMMUNICATION**

on all known parties to R.02-01-011, or their attorneys of record, that have provided copies of their e-mail addresses. I served a copy of the document on those without e-mail addresses by mailing the document by first-class mail addressed as follows:

See attached service list

Executed this 8<sup>th</sup> day of February 2007, at Sacramento, California.



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Vicki Ferguson

# **CALIFORNIA PUBLIC UTILITIES COMMISSION**

## **Service Lists**

**Proceeding: R0201011 - PUC - DIRECT ACCESS**

**Filer: CPUC**

**List Name: LIST**

**Last changed: February 6, 2007**

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